# Objection – SSD-94261458, 135–155 New South Head Road and 529–539 Glenmore Road, Edgecliff

11 November 2026

**Executive Summary**

This submission objects to State Significant Development Application SSD-94261458 (135–155 New South Head Road and 529–539 Glenmore Road, Edgecliff). The application should be refused, or at minimum deferred until the broader Edgecliff–Woollahra Precinct State-led Rezoning is finalised.

The primary grounds for objection are:

**Pre-empts the precinct rezoning.** The application seeks a spot rezoning inside a precinct the Government is replanning as a whole. The applicant chose the fast-track pathway because the precinct process "is likely to take a considerable time" and "Woollahra Council is opposed to development of this scale" (EIRS pp. 50–52).

**Excessive scale, justified by profit, not planning.** 26 storeys and an FSR of 6.79:1, against current controls of 14.5m and 1.5:1 and the 10 storeys and 2.6:1 in Council's ECCS. The EIRS admits the height is "needed to ensure viability" (p. 61).

**Temporary affordable housing, justified by a bonus the Government proposes to switch off.** 28 apartments, about 15% of floor space, affordable for only 15 years. The Government's precinct proposal requires contributions in perpetuity and switches off the in-fill affordable housing bonus the applicant relies on to justify its FSR (EIE pp. 17, 24).

**Flood risk understated.** The EIRS says the site is not flood affected; the applicant's own flood report says the Glenmore Road frontage is in Council's low and medium flood risk precinct. In a 1-in-100-year flood, Glenmore Road, the main pedestrian entry, is classed H5, "unsafe for vehicles and people", yet no flood emergency plan is proposed. The rezoning has not been assessed against the new Ministerial Direction on flooding that took effect on 1 July 2026.

**Deep excavation below the water table, with key risks unassessed.** A basement up to about 21m deep, 2–8m below the water table, in loose sand. Groundwater was monitored for one month against a three-month minimum. The dewatering model assumes a watertight wall that the geotechnical report says has a "very high" potential to leak. The excavation is "anticipated to undermine the foundations of the terrace houses". Contaminated groundwater, including heavy metals and PFOS, would be discharged to Rushcutters Bay with no treatment design.

**Heritage loss the applicant's own consultant does not support.** Six contributory buildings in the Paddington HCA are reduced to facades. The Heritage Impact Statement finds they meet

the threshold for local listing and that demolition is "not driven by structural instability … but rather by the extent of redevelopment".

**Severe impacts on neighbours**. Nine of the 22 viewpoints assessed in the neighbouring “Diseno” apartment complex, 161 New South Head Road, are rated "severe" or worse; solar access compliance falls to 51% against the 70% standard; 30 of 34 street-level wind test points become windier.

**No cumulative assessment. Traffic, flooding, groundwater and wind are assessed as if not other development is happening**, although Council's modelling shows New South Head Road has less than 7% spare capacity. The proposal includes 103 car spaces on a site a 5-minute walk from Edgecliff Station.

I ask the Department and the consent authority to:

- Refuse the application and the proposed amendment of the Woollahra LEP 2014.
- In the alternative, defer determination until the Edgecliff–Woollahra Precinct State-led Rezoning Proposal is finalised, with any uplift on this site decided within a staged framework that takes effect only once Woollahra Station is committed and delivered.
- Give no weight to Council's Alternative Approach or to in-fill Affordable Housing Bonus reasoning in setting the height or FSR, and require any affordable housing to be delivered on-site and in perpetuity.
- Before any determination, require the missing assessments, including:
    - a cumulative impact assessment;
    - a detailed flood assessment against the current Ministerial Direction;
    - at least three months of groundwater monitoring;
    - a treatment design for contaminated groundwater;
    - a structural and conservation strategy for the heritage terraces;
    - view and solar assessments of Diseno against a compliant scheme.
    - Refer the application to the Independent Planning Commission for determination

# Introduction







I object to State Significant Development (SSD) Application SSD-94261458 and the concurrent amendment of the Woollahra Local Environmental Plan 2014 (LEP). The application should be refused. At a minimum, it should not be determined until the Edgecliff–Woollahra Precinct State-led Rezoning Proposal has been finalised.

I make this submission as the Councillor for Vaucluse Ward, Woollahra Municipal Council. I have read the Environmental Impact and Rezoning Statement (EIRS), prepared by Ingham Planning, and the technical appendices relied on to support it.

The proposal seeks a 26-storey tower on New South Head Road and a 12-storey tower on Glenmore Road. It would provide 94 apartments over a basement of up to six levels. It also seeks to raise the maximum building height from 14.5m and 9.5m to RL106.2m and RL57.4m, and the floor space ratio (FSR) from 1.5:1 to 6.79:1 (EIRS p. 47). That is more than four times

the current FSR control. It is also well over twice the 10 storeys and FSR of 2.6:1 proposed for the site in Council's Edgecliff Commercial Centre Planning and Urban Design Strategy (ECCS) (EIRS p. 18).

# Ground 1: The application pre-empts the precinct rezoning

**This is a spot rezoning inside a precinct that the NSW Government is now replanning as a whole. It should not be determined ahead of that process.**

The EIRS accepts that the site "is also likely to be part of the Woollahra and Edgecliff Railway Station Activation Strategy and State-led rezoning" (EIRS p. 128), but is open about why the Housing Delivery Authority (HDA) pathway was used instead. The precinct rezoning "is likely to take a considerable time to complete and is also linked to the construction of the new station. Whereas the HDA pathway aims to facilitate faster delivery" (EIRS pp. –51; repeated p. 52).

The EIRS also explains why the applicant did not use the usual planning proposal process through Council: that process **"would take a significantly extended period, noting that Woollahra Council is opposed to development of this scale" (EIRS p. 52). In other words, the fast-track pathway was chosen to get ahead of the precinct rezoning and around Council's opposition.**

**The Government has already recognised the risk.** Woollahra Municipal Council's submission on the Edgecliff–Woollahra Precinct State-led Rezoning Proposal (Council submission) records that "the determination of further HDA EOIs [expressions of interest] within the Precinct has been deferred until the Rezoning Proposal was placed on exhibition" (Council submission, PDF p. 202). This site was declared in August 2025, before that pause (EIRS p. xvi), but the same principle should apply to it: site-by-site HDA decisions should not run ahead of the precinct framework.

Council's submission explains why sequencing matters:

> ***No infrastructure-dependent development capacity is to be created until the infrastructure relied upon to justify that capacity is fully funded, programmed and legally committed to delivery.*** *Permanent development rights must not be granted on the basis of infrastructure that remains uncertain, unfunded or dependent on future government decisions. (Council submission, p. 98)*
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> ***Once development rights are granted, they cannot easily be clawed back.*** *(Council submission, p. 99)*

**Approving this rezoning would also set a benchmark for the precinct.** The EIRS already relies on other site-specific approvals and proposals, including the 35-storey Edgecliff Centre, to justify its height (EIRS pp. 11, 83). The applicant describes the proposal as "only around 1% of

what is required" (EIRS p. 77). That is precisely why it should be considered within the precinct plan, not ahead of it.

**The proposal would also avoid the obligations the precinct plan proposes to impose with respect to affordable housing.** The NSW Department of Planning, Housing and Infrastructure's Explanation of Intended Effect (EIE) for the precinct rezoning proposes an affordable housing contribution of 3% in perpetuity on all new residential development, including SSDs, and up to 15% in perpetuity on identified uplift sites (EIE section 2.9, p. 17). This application offers affordable housing for 15 years only.

The EIRS also argues that its offer is better than Council's. Council's draft affordable housing amendment to its LEP phases in its affordable contribution at 0.5% of residential floor space one year after the LEP is made and rising to 3.5% after five years.

The EIRS says that because "it is intended that the proposal proceeds swiftly if a consent is granted", the requirement for this development "would be 0-0.5%" (EIRS p. 95). It then presents its 15% for 15 years as "a much better affordable housing outcome than is likely under Council's proposal" (EIRS p. 96). **But that comparison does not address Council's separate affordable housing contribution rate for its Edgecliff Commercial Centre Strategy, which is a minimum of 5% of new residential floor space in perpetuity.**.

# Ground 2: The proposal lacks strategic merit

The application's strategic justification has three flaws:

**First, it relies on the scale of growth that is informed by and depends on the delivery of a new Woollahra Station. Council's requests for the business case and financial modelling for the station were refused or released only in heavily redacted form, largely on grounds of Cabinet confidentiality (Council submission, pp. 12–13).** No credible funding strategy has been exhibited for the $1.33 billion in infrastructure the precinct requires (Council submission, p. 6). The station's final cost and funding therefore remain uncertain.

**Second, it misrepresents Council's Alternative Approach,** which is tied to a staged statutory framework, a committed Woollahra Station and funded infrastructure.

**Third, the applicant's own reports show that the height has been set by what the developer needs to make the project financially viable,** not by what is proposed or appropriate for the site.

## Uplift ahead of the infrastructure it depends on

One of the project's stated objectives is to "ensure efficient use of existing and planned infrastructure related to the new Woollahra and upgraded Edgecliff railway stations" (EIRS p. 23). Yet the applicant chose the HDA pathway specifically to avoid waiting for that infrastructure (EIRS pp. 50–52).

**Council's position is that the Government should confirm "the feasibility, full funding, delivery responsibilities and binding delivery program for Woollahra Station and all supporting transport, utility, open-space, social and community infrastructure before any rezoning is finalised"** (Council submission, recommendation D, p. 10). The rezoning should be staged, and no stage should take effect before Woollahra Station is delivered. The roads around Edgecliff are already not coping with existing development (see Ground 7).

## Council's Alternative Approach is misrepresented

The applicant uses Council's Alternative Approach when it helps and rejects it when it does not:

- The EIRS says Council's "previous concerns regarding scale were likely to be of lesser importance now that Council's Alternate Approach recommended a 24 storey building for the site" (EIRS p. 44).
- In the same document, it calls the 24-storey form "unjustifiably low" (EIRS p. 66) yet concedes "the implications have not been fully assessed" (EIRS p. 64).
- Its conclusion still claims consistency with "the vision established by Council's ECCS and their 'Alternate Approach'" (EIRS p. 128).
- The Urban Design Report by MHN Design Union presents the proposal as having "a comparable overall height" to Council's envelope and as "sitting within Council's envisaged 24–35 storeys building height" (Appendix F1, pp. 32, 42). The 24–35 storey range is Council's precinct-wide range, not a height for this site.

**Council's Alternative Approach is not an approval for this site. Council recommends it only "as the basis for the first stage of any future rezoning, subject to further investigation, refinement and public consultation"** (Council submission, recommendation B, p. 10). It is tied to a staged statutory framework, a committed Woollahra Station and funded infrastructure (recommendations C, D, F and G, pp. 10–11, 98–99). **It is only feasible if Woollahra Station is built.** It also seeks to "substantially retain the contributory buildings at 529–539 [Glenmore Road], maintaining their principal forms" (quoted in Appendix F1, p. 32). This proposal keeps only their facades.

## Height is driven by feasibility, measured against benchmarks that are not controls

The EIRS concedes that "the height proposed (26 storeys above New South Head Road compared to the ECCS's 10 storeys) is not consistent with the ECCS" (EIRS p. 61). **Its justification is financial: "Buildings of such height are needed to ensure viability"** (EIRS p. 61), **and "the ECCS uplift is not sufficient to cover the significant construction costs"** (EIRS p. 60).

The Urban Design Report shows the same reasoning…" and "to keep the total floor area the developer needs. The scheme was split into two towers with a gap between them, which reduced the floor space area. The taller tower was then "increased in height to compensate for GFA [gross floor area] removed through the central separation" (Appendix F1, p. 36). In other

words, floor space lost in one place was simply added on top, to maintain the required but unstated profit margin. Whether a project makes enough money is a matter for the developer. It is not a reason to approve a building of this height, which should be justified by its impacts and strategic fit within the surrounding area.

### Capacity is not delivery

**The HDA case rests on urgency. But Woollahra's supply is limited by the market, not by zoning.** The applicant's own economic report records average completions of about 63 dwellings a year (EIRS p. 111). Savills advised Council that even 240 new units a year in the precinct is optimistic, given competition from more than 900 dwellings in SSD and Low and Mid-Rise (LMR) Housing applications and a proposed 433-unit HDA project in Rose Bay (Council submission, pp. 24–25).

The State's Low and Mid-Rise Housing rules already allow more housing in the streets around Edgecliff, yet the EIRS concedes there have been "very few approvals to date" (EIRS p. 78). The EIRS attributes this to lot sizes, land values, heritage and construction costs, and uses the constraints to argue for greater height on this site. The more likely explanation is that landowners and developers are waiting to see what the precinct rezoning will allow, a further reason to resolve the precinct plan first. Approving individual sites ahead of it rewards those who move early and encourages others to hold back until they can do the same.

### Loss of employment floor space

The proposal reduces commercial floor space from 2,667 sqm to 1,439 sqm, "because the proposal is a HDA project and places greater emphasis on housing" (EIRS p. 76). **Yet the applicant's economic report states that "existing and anticipated future retail supply is unlikely to satisfy all future demand"** (EIRS p. 112). A net loss of commercial space in the Edgecliff Commercial Centre does not support the claimed revitalisation.

## Ground 3: The affordable housing offer is overstated and time-limited

The affordable housing is the main public benefit claimed. It is smaller than the EIRS says in places, it is temporary, and the floor space is justified using faulty and non-applicable in-fill Affordable Housing Bonus reasoning.

### Overstated

The affordable component is 28 apartments, or 15.11–15.12% of gross floor area (EIRS pp. xvii, 22, 32). Elsewhere the EIRS says the proposal provides "30% of GFA as affordable housing" (EIRS p. 54) and "30% of GFA as affordable housing, vastly more than the 3% proposed in the

ECCS" (EIRS p. 61). Both figures cannot be right. The lower figure is the one supported by the drawings (Appendix F1, p. 57).

The comparison with the ECCS is also wrong. **Council's affordable housing contribution rate for the Edgecliff Commercial Centre Strategy is a minimum of 5% of new residential floor space in perpetuity, not 3%.**

## Temporary affordable dwellings

The apartments are to be affordable "for a period of 15 years" (EIRS p. 32), after which they revert to the market. **Council's submission calls for affordable housing "to be retained as affordable housing in perpetuity"** (Council submission, recommendation I(iv), p. 11). **The State's own precinct proposal requires contributions in perpetuity** (EIE section 2.9, p. 17).

**The rents will be capped at or below the local average, which the EIRS concedes "may still be out of reach of very low and low-income households"** (EIRS p. 95). No provider is committed. The letter at Appendix C only "indicates that a community housing provider is available" (EIRS p. 95).

## Floor space justified using Affordable Housing Bonus reasoning

The EIRS states that the project "does not rely on the application of Chapter 2 of the Housing SEPP" (EIRS p. 72). But its FSR argument is built on that bonus: "assuming application of the 30% affordable housing bonus possible under the Housing SEPP, the permitted FSR would be 6.5:1" (EIRS p. 61). The Glenmore Road tower is justified the same way: "3 storeys are equivalent to the 30% affordable housing bonus that would apply to a 10 storey base height limit" (EIRS p. 79).

The same reasoning appears in the visual material. The Urban Design Report's view comparisons stack an "AFFORDABLE UPLIFT" layer on top of the ECCS and refused 2013 envelopes (Appendix F1, pp. 52–53).

**The in-fill bonus should play no part in setting controls in the rezoning area. The Government's own precinct plan says so.** The EIE for the Edgecliff-Woollahra Precinct State-led Rezoning Proposal states that because development in the precinct will be required to contribute to affordable housing, "no additional affordable housing incentives are available in the Precinct", and it proposes "to switch off the application of the in-fill affordable housing floor space ratio and height of building bonuses" under the Housing SEPP (EIE section 3.3.1, p. 24).

The contrast with One Darling Point Road, at 136–148 New South Head Road, which is opposite the Edgecliff Centre, demonstrates this point. In this case, the base controls were first raised through a site-specific amendment to the Woollahra LEP 2014, to 12 storeys (46m) and an FSR of 5:1. That amendment was tested through Council's planning proposal process and came with a Voluntary Planning Agreement, executed in February 2024, that included an affordable

housing contribution of 5% of residential floor space and contributions to community infrastructure (One Darling, Statement of Environmental Effects, Ethos Urban). Only then was the Affordable Housing Bonus applied, under the Housing SEPP's own rules, taking the scheme to 17 storeys (59.8m) and an FSR of 6.5:1 (EIRS p. 11). The bonus was a defined, capped addition to controls that were already law.

This application reverses that order. There is no uplifted base control for a bonus to sit on: the current controls are 14.5m, 9.5m and an FSR of 1.5:1.

Even on its own terms, the applicant's arithmetic does not hold. The ECCS proposed 10 storeys and an FSR of 2.6:1 for this site (EIRS p. 18). Adding a 30% bonus to that would give about 13 storeys and an FSR of about 3.4:1. Instead, the EIRS simply asserts that the site's "base" FSR "should be 5:1", in line with other ECCS sites, and adds 30% to reach 6.5:1, close to the 6.79:1 sought (EIRS p. 61). The 5:1 base is the applicant's own number, not one proposed for this site by Council or anyone else. The height has no bonus logic at all. At 26 storeys it is more than two and a half times the ECCS's 10, and the EIRS admits it "is not consistent with the ECCS" and is "needed to ensure viability" (EIRS p. 61). The ECCS itself "is not yet planning law" (Appendix W, p. 49). The application offers no voluntary planning agreement, and the precinct plan proposes to switch the bonus off altogether.

### The affordable homes get the worst amenity

All 28 affordable apartments are studios to three-bedroom units on the lowest residential floors (EIRS p. 32). The upper floors include four-bedroom sub-penthouses and penthouses (EIRS p. 28). **The lower floors of the New South Head Road tower need upgraded acoustic facades** (EIRS p. 109).

**The architect's unit schedule shows 26 apartments failing the two-hour midwinter solar standard** (Appendix F1, p. 57). Read against the floor allocation in the EIRS (EIRS p. 32), at least 15 of the 28 affordable apartments fail, compared with about 10 or 11 of the 66 market apartments. **The only three apartments in the building with no direct sun at all are on the affordable floors.** The Pedestrian Wind Environment Study by Windtech Consultants found the two windiest balconies, including one at the 23 m/s safety limit, on Level 2 of the same tower (Pedestrian Wind Environment Study, Appendix X1, p. 41).

## Ground 4: Flooding, groundwater and ground stability have not been properly assessed

The application proposes a basement up to about 21m below New South Head Road, through loose sand and below the water table, next to heritage buildings, a railway bridge and a high-hazard flood path. The assessments supporting its design are incomplete, inconsistent with each other, and defer key questions to conditions.

## The site is flood affected, contrary to claims made in EIRS

The EIRS describes "a resilient, BASIX-compliant built form not affected by natural or urban hazards" (EIRS p. 16). It says "the site is not identified as flood affected in Council mapping" (EIRS p. 75).

**The applicant's own Flood Impact and Risk Assessment (FIRA), prepared by BG&E, says the opposite: the Glenmore Road frontage "is classified as being in a low and medium flood risk precinct" in Council's floodplain risk management mapping** (FIRA, Appendix R, p. 2).

The consultant then downgrades Council's classification without analysis: "a low flood risk classification is considered more appropriate" (FIRA, Appendix R, p. 2). Any change to Council's flood mapping should come through Council's floodplain risk management process, not an applicant's report.

## High hazard at the front door, and no emergency plan

> ***For Glenmore Road, flood hazard adjacent to the building area is classified as H5 (unsafe for vehicles and people, all buildings vulnerable to structural damage) and as such evacuation during a flood to Glenmore Road would not be suitable.*** *(FIRA, Appendix R, p. 7)*

This applies in the 1% annual exceedance probability (AEP) flood, the 1-in-100-year event, with velocities over 2 m/s (FIRA, Appendix R, p. 6). **Glenmore Road is the main pedestrian entry to both residential buildings and to the public through-site link (EIRS p. 33). Despite this, the report concludes: "Given the low risk of flooding and dry access and egress a flood emergency response plan (FERP) or shelter-in-place plan is not required"** (FIRA, Appendix R, pp. 11, 15). The "dry" laneway relied on for emergency access has its own 1% AEP flood levels and leads onto the same H5 road (FIRA, Appendix R, p. 10).

## Not assessed against the current Ministerial Direction or cumulative growth

The EIRS addresses Ministerial Direction "4.1 Flooding" only (EIRS p. 75). The revised s9.1 Direction P5.7 Flooding took effect on 1 July 2026. **Council's flood consultants advise that rezoning proposals must now be supported by a detailed FIRA under the LU01 guideline. They must also show that denser development is "neither located on high-hazard land ('H5' and 'H6' categories) nor adjacent to roads subject to high hazard that would prevent evacuation"** (Council submission, p. 74; PDF pp. 250–251). The rezoning component of this application has not been tested against that Direction.

**The Secretary's Environmental Assessment Requirements (SEARs) required the flood assessment to address "cumulative impacts of the immediate locality and the broader growth planned for the Edgecliff Precinct"** (FIRA, Appendix R, p. 2). The compliance table marks this "Yes" (FIRA, Appendix R, p. 14). But the section it points to compares only this development with the existing site (FIRA, Appendix R, p. 8). The model uses 1987 design rainfall (FIRA,

Appendix R, p. 7). Council requires a high-emissions SSP5-8.5 climate sensitivity test (Council submission, PDF p. 251).

**Floor-level compliance relies on treating flood-exposed areas as non-habitable with 0.3m freeboard** (FIRA, Appendix R, p. 12). It is also achieved "by blocking existing entries" in the heritage terraces (Appendix R, p. 12). Council's position is that freeboard must stay consistent with its existing controls (Council submission, PDF p. 251).

## Excavation depths are understated

The EIRS describes excavation of 5–7m below the existing basement, a maximum of about 18m below New South Head Road, and 8–11m in the south-west (EIRS p. 119).

The Report on Geotechnical Investigation by Douglas Partners, issued on 7 October 2026, gives depths of 8–10m, about 21m and 11–14m respectively (Geotechnical Investigation, Appendix E1, p. 11). Excavations will be "about 2-8 m below the groundwater table" (Geotechnical Investigation, Appendix E1, p. 12).

## The groundwater assessment falls short of the regulator's minimum

The regulator's checklist reproduced in the Dewatering Management Plan, also prepared by Douglas Partners, requires "continuous water level records from monitoring bores for at least 3 months" (Dewatering Management Plan, Appendix E2, checklist, PDF p. 3). The hydrographs cover only 3 June to 4 July 2026 (Dewatering Management Plan  Appendix E2, Appendix D).

The plan says groundwater showed "negligible response to rainfall" (Appendix E2, p. 8), but no day in the record had more than about 15mm of rain. **The same firm's geotechnical report says "groundwater levels can rapidly rise within the sands by up to about 2 m following periods of intense or prolonged rainfall", and recommends a design level 2m above the measurements** (Appendix E1, p. 18). **The groundwater model does not apply that allowance.**

The geotechnical report also says inflow volumes "would need to be estimated following long-term groundwater monitoring", and that modelling "is carried out once details of the shoring and dewatering systems are available" (Geotechnical Report, Appendix E1, p. 18).

**Neither condition is met. Instead, the dewatering model treats the shoring wall around the excavation as completely watertight, "an impervious barrier" (Appendix E2, p. 13), even though the geotechnical report acknowledges the opposite is possible.** It warns that "the potential for misalignment and therefore seepage and sand loss through gaps in deep secant pile walls is very high" (Appendix E1, p. 14).

Even the model's "worst-case" scenario (Appendix E2, p. 11) keeps the wall watertight and only assumes the sandstone below is more permeable. The plan cannot even describe that scenario consistently: it is ten times the base permeability in one place and five times in another (Appendix E2, pp. 11, 13). If the wall leaks, as the geotechnical report warns it may,

groundwater inflows, drawdown and the settlement risk to neighbouring buildings could all be greater than predicted.

## Settlement, damming and the heritage terraces

**The geotechnical report states that "the excavation is anticipated to undermine the foundations of the terrace houses", and that "underpinning of the footings may need to be considered"** (Geotechnical Report, Appendix E1, p. 11). It warns that piling in sand can cause "decompression and loosening of the surrounding soils, which may cause damage to surrounding properties", including the "sensitive heritage terraces" (Geotechnical Report, Appendix E1, p. 20).

**The Dewatering Management Plan nonetheless calls the settlement risk "low" without any settlement calculation** (Dewatering Management Plan. Appendix E2, p. 15). It predicts 1.4m of drawdown next to the excavation (Dewater Management Plan, Appendix E2, p. 14), but sets the drawdown trigger at 2m (Appendix E2, p. 17).

Drawdown is to be monitored using the existing wells (Appendix E2, p. 21). These are all on the site, two of them inside the existing basement, so the excavation will remove them.

**The geotechnical report warns of a "'damming' effect" from a basement below the water table, which "may cause the water table to rise on one side of the basement and drop on the other side"** (p. 19). But the Dewatering Management Plan "addresses construction-phase dewatering only" (p. 16) and gives no figure for mounding (p. 15). The plan lists the NSW guideline on cumulative groundwater impacts among those it consulted (p. 2), but no cumulative assessment was done.

## Contaminated groundwater bound for Rushcutters Bay

The groundwater beneath the site, which will be pumped out during excavation, is contaminated. Samples taken on the site exceeded the criteria for safe discharge for suspended solids (up to 6,400 mg/L), nutrients, heavy metals (chromium, copper, lead, nickel, zinc and arsenic), the "forever chemical" PFOS, the banned pesticide dieldrin, and petroleum hydrocarbons (Dewatering Management Plan, Appendix E2, pp. 9–10).

This water will be discharged into the stormwater system, which drains to Rushcutters Creek and Rushcutters Bay (pp. 4, 18). Yet the proposal does not include a water treatment plan: "A detailed treatment schematic will be provided in the detailed DMP prior to construction" (p. 19). Consequently, the community and the consent authority are being asked to accept discharge of contaminated water into the harbour without a concrete proposal for how it will be made safe.

**Excavation may also disturb acid sulfate soils.** These soils are harmless while they stay waterlogged, but when they are dug up or drained they can release corrosive atmospheric sulfuric acid and contaminate waterways. **Of 46 soil samples screened on the site, 43 (93%)**

**showed a warning sign for acid sulfate soils (Appendix E1, p. 9). Only three samples, all from a single borehole, were then tested in detail. On that basis, the geotechnical report concludes that acid sulfate soils are "unlikely" and that an Acid Sulfate Soil Management Plan "is not considered necessary"** (Appendix E1, pp. 9, 23). Yet the Dewatering Management Plan, issued by the same firm on the same day, says samples are "currently undergoing additional testing" (Appendix E2, p. 7). The question has not been settled, and it should be before any approval is given, not after.

### Other required assessments are not done

Sydney Water "will require a Specialist Engineering Assessment" for sewer mains on and around the site. Transport for NSW (TfNSW) "might require assessments" for New South Head Road and the railway bridge over Glenmore Road (Appendix E1, pp. 13, 23). Neither has been done.

**Council commissioned hydrogeological and geotechnical studies of Rose Bay and Double Bay following evidence of excavation damage to neighbouring properties. Those suburbs show the risk of approving deep basements in sandy ground ahead of a cumulative assessment. These matters must be resolved before determination, not left to conditions of consent.** At a minimum, a precinct-scale hydrogeological and geotechnical investigation, including settlement risk to heritage buildings, should precede any rezoning of this site.

## Ground 5: The heritage impacts are unacceptable

**Figure 4 – rear of 135-155 New South Head Road**



Source - Googlemaps

**Figure 5 – existing terraces at 529-539 Glenmore Road Edgecliff**

The six buildings at 529–539 Glenmore Road, five terraces and the former corner shop-top at No. 539, are contributory buildings in the Paddington Heritage Conservation Area.

The proposal retains only their street facades, demolishes the rest for the basement and podium, and places 12- and 26-storey towers immediately behind them. The applicant's own Heritage Impact Statement, prepared by Urbis (Appendix O1), supports refusal on several points.

## By the applicant's own test, the terraces meet the threshold for local listing

The Heritage Impact Statement states the rule for a local heritage listing: "To be considered for heritage listing for local significance, an item must meet at least one of the seven assessment criteria" (p. 62). It then finds: **"The terrace row is therefore considered to meet the threshold for representative significance at a local level"** (p. 65). Externally, "the group remains largely intact, retaining its original scale, form and key façade elements" (Appendix O1, pp. 14, 86). **That contradicts the EIRS's description of the terraces as "highly modified and … not worthy of retention in their entirety"** (EIRS p. 83).

## The *Helou* test shows demolition is driven by the development

Council asked for the proposal to be assessed against the planning principle in *Helou v Strathfield Municipal Council* (Appendix O1, p. 85). The Heritage Impact Statement quotes the principle: "The demolition of a building which contributes to a conservation area will impact on the area's heritage significance even if its replacement building 'fits' into the conservation area" (Appendix O1, p. 85). Its answers concede that:

- "The proposed partial demolition is not driven by structural instability or unsafe condition, but rather by the extent of redevelopment proposed for the site" (Heritage Impact Statement Appendix O1, p. 86).
- The terraces could be kept and made safe: "the building can be rendered structurally safe". The reason more of their fabric cannot be kept is the scale of the development itself, including "the requirements of the proposed basement excavation" (p. 86). In other words, the terraces are being largely demolished to make room for the basement, not because they are unsafe.

No cost information is provided on whether retention would impose an unreasonable burden (Heritage Impact Statement, Appendix O1, pp. 86–87).

**The only obstacle to keeping more of the terraces is the applicant's own basement and tower design.** Council's Alternative Approach proposes "substantially retain … their principal forms" of the terraces (EIRS p. 68), which shows a lower-impact option exists.

## Key controls are not met, and key work is deferred

**Council's agency advice asked for a fabric analysis, a structural solution, a Conservation Management Strategy, a view analysis of heritage items, and a discussion of alternatives** (Heritage Impact Statement, Appendix O1, pp. 88–90). In response:

- "**No detailed assessment of significant internal heritage fabric has been provided"** (Heritage Impact Statement, Appendix O1, p. 98).
- **"No detailed information has been provided regarding proposed internal structural modifications"** (Heritage Impact Statement, Appendix O1, p. 98). This contradicts the earlier claim that a structural strategy accompanies the application (p. 89).
- Before the application was lodged, the applicant was asked to prepare a Conservation Management Strategy for the six contributory buildings, setting out how their significant fabric would be protected, salvaged, stored and reinstated. It declined, saying such strategies are "not generally prepared for contributory buildings within a conservation area", and recommends that these methods be prepared "following any approval" (Appendix O1, p. 89). A photographic archival recording of the terraces and a Heritage Interpretation Plan are also left until after approval (Appendix O1, pp. 89–90). Consequently, the Department is being asked to approve major works to contributory buildings without seeing how they will be protected.
- **Council's request for a larger setback to retain more of the terraces' original form was not adopted** (p. 90).
- **Alternatives are said to have been "considered", but none are described** (p. 88).

## The facades themselves are at risk

The Heritage Impact Statement says the proposal "will retain and conserve all original elements of the principal façades" (p. 106).

**But the flood report only achieves floor-level compliance "by blocking existing entries" into the terraces (FIRA, Appendix R, p. 12), and the geotechnical report expects the excavation "to undermine the foundations of the terrace houses"** (Geotechnical Report, Appendix E1, p. 11). The method for protecting the retained facades has not been designed.

## Neighbouring and draft heritage items are not properly assessed

**The statement of significance for the draft-listed cottages at 543–547 Glenmore Road is recorded as "NIL" (Heritage Impact Statement, Appendix O1, p. 67), even though the report cites Council's 2022 inventory sheet for those cottages** (p. 33). The same applies to the listed sandstone cottage at 549 Glenmore Road (p. 67). Its relationship to a 12-storey tower next door is treated in general terms only. **The Cadry's building, a c.1850s former hotel and a locally listed heritage item, would sit against a nil-setback podium with a tower set back only 3m above** (EIRS p. 79).

## The cumulative impact on the Paddington HCA

**Council's submission for the Edgecliff-Woollahra Precinct State-led Rezoning Proposal warns that "the cumulative effect of multiple towers along New South Head Road, New McLean Street and Glenmore Road has been significantly understated".** It adds that "these impacts cannot be properly understood through assessment of individual sites in isolation" (Council

submission, pp. 60–61). **Council recommends that "building heights adjacent to and within the Paddington HCA should be substantially reduced"** (p. 61). Part of this site is within the Paddington HCA.

The only documented significant view affected is View 49 in the Paddington HCA provisions of the Woollahra Development Control Plan 2015 (DCP), looking down Cascade Street. The applicant presents the tower as a benefit because it "acts as the end point of an axial vista looking towards the site down Cascade Street" (Visual and View Impact Assessment, Appendix W, p. 20). **This interpretation is better described as a heritage impact, because the A 26-storey tower closes off a protected conservation area view.**

## Ground 6: The impacts on neighbours are unreasonable

The most affected neighbour is the 68-unit “Diseno” apartment building at 161 New South Head Road. **The application's own reports show severe view loss, a fall to 51% compliance with the Apartment Design Guide (ADG) solar access standard, and new wind and noise impacts.** All are dismissed by comparing the impacts with benchmarks that are not planning controls.

## Severe view loss, judged against the wrong benchmark

**The Visual and View Impact Assessment rates the impact at 22 viewpoints in Diseno (Visual and View Impact Assessment, Appendix W, pp. 27–48). By its own ratings, nine are "severe" or worse, eg severe-devastating. These cover Levels 8, 9 and 11, the floors with CBD, Sydney Tower, Harbour Bridge and North Sydney views.** At Level 11 (VP22), "the proposal will result in the loss of the existing views with the exception of a small part of North Sydney … the impact is concluded to be severe-devastating" (p. 48). Four more are rated moderate and one minor–moderate. **Yet the conclusion is that "the view loss resulting from the proposal is not considered to be unreasonable"** (p. 49).

Every view is found reasonable by comparison with "the building envelope previously supported by DPE for the Glenmore Road properties" and the ECCS envelope (Visual and View Impact Assessment, Appendix W, pp. 27–49). The first was not supported by the Sydney East Joint Regional Planning Panel Regional Panel (Visual and View Impact Assessment Appendix W, p. 8). The second "is not yet planning law" (Visual and View Impact Assessment, Appendix W, p. 49).

**No montage shows a building complying with the current controls.** Under step 4 of *Tenacity Consulting v Warringah Council* [2004] NSWLEC 140, view loss arising from non-compliance with planning controls may be unreasonable even where the impact is only moderate. **Here the impacts are severe and the non-compliance is large.**

**All 22 entries give the same answer to the skilful-design question: "A more skillful design could not minimize the view impacts"** (Visual and View Impact Assessment, Appendix W, pp.

27–48). **No alternative is modelled, including a lower tower or Council's Alternative Approach.** Each entry also ends with the same paragraph: "This view is over a side boundary and therefore, as noted in Tenacity, difficult to retain. Therefore such views should not be a restriction to the development of the subject site."

**That reasoning does not reflect the Land and Environment Court's more recent approach in *Furlong v Northern Beaches Council* [2022] NSWLEC 1208 with respect to view loss from side boundaries. In this case, a refusal was upheld because of the "devastating" loss of a high-value view across a side boundary, where a reasonable design alternative would have reduced the impact.** The proposal in *Furlong* complied with the controls; this proposal exceeds the current height control by more than five times and the FSR control by more than four times.

**Only 22 of Diseno's 68 apartments are assessed, and none below Level 5** (Visual and View Impact Assessment, Appendix W, p. 25). Other neighbours, including Ranelagh, One Darling, 2–10 New McLean Street and the Glenmore Road residences, are dismissed using "images from real estate websites" without photomontages (Visual and View Impact Assessment, Appendix W, pp. 22–25).

## Solar access falls to 51%, and compliance depends on the neighbour rebuilding

The Urban Design Report shows that, with the proposal, only "35 UNITS = 51%" of Diseno's 68 apartments receive two hours of midwinter sun, against the ADG requirement of 70% (p. 54). Its next drawing is titled "161 NEW SOUTH HEAD ROAD (FUTURE CONTEXT TO ACHIEVE 70%)". It shows that Diseno would meet the 70% standard again if the building extended upwards: by three storeys to reach 71%, or by nine storeys to reach 83% (Appendix F1, p. 55). **In other words, the applicant's answer to the loss of sunlight to a 68-apartment, 11 storey strata building, constructed circa 2000, is for the owners to redevelop it, which is not a realistic outcome.** The report also does not show how much sun Diseno's apartments receive now, so the actual loss cannot be measured. Both drawings are dated 4 November 2025, before the design was changed, so they may not even reflect the current proposal.

The EIRS confirms that "the proposal will result in the ADG solar access requirement not being met" (EIRS p. 88). It attributes this to Diseno "borrowing" amenity from the site (EIRS pp. 88–89).

**The EIRS's answer is that these impacts are "offset by the affected properties also being the subject of uplift and being able to be redeveloped and redesigned to reduce these impacts" (EIRS p. 89). That is not a realistic assessment.** Opposite the site is the new 7 storey mixed use development at 2 Mona Road, which the EIRS itself describes as "the only recent construction" in Edgecliff since the 1990s (EIRS p. 9). Established strata buildings like the Diseno, and new ones in particular, will stand for decades.



**Figure 7 — new development at 2 Mona Road opposite the site**

The 11 storey Diseno building (161 New South Head Road) is to the right.

**The impacts of this proposal must be assessed against the neighbouring buildings as they are**, not against a hypothetical future in which they are rebuilt to suit it.

## Separation, privacy and landscape

The EIRS concedes that ADG building separation "cannot be achieved" (EIRS p. 87), and that the 12m tower separation "is less than the ADG guidance" (EIRS p. 84).



Source - Googlemaps

**Figure 3 – 135-155 New South Head Rd Edgecliff**

The Urban Design Report claims the same 12m separation is "in accordance with the Apartment Design Guide" (Urban Design Report, Appendix F1, p. 37). Its site plan shows a 2.4m setback towards 157–159 New South Head Road (Urban Design Report, Appendix F1, p. 41), a significant reduction from the setback of the existing building (see photo above).Deep soil is 30 sqm, or 1.6% of the site (Urban Design Report, Appendix F1, p. 57; EIRS p. 87).

### Windier streets, with untested fixes

**Of the 34 street-level test points, 30 become windier** (Pedestrian Wind Environment Study, Appendix X1, pp. 39–40). On the Glenmore Road footpath beside the terraces and draft heritage cottages (P17), the comfort wind speed rises from 3.6 to 6.6 m/s. **On the New South Head Road footpath south-east of the site (P27), a location that passes today fails at 8.2 m/s. Two points on the site's own New South Head Road frontage also move from pass to fail** (pp. 39–40).

**The proposed fixes rely mainly on vegetation, yet "the effect of vegetation was also excluded from the testing"** (Pedestrian Wind Environment Study, Appendix X1, p. 1). **They include street trees in a road reserve subject to a road-widening order** (EIRS pp. 6, 96). The treatments were never re-tested (Pedestrian Wind Environment Study, Appendix X1, p. 28).

### Construction noise and vibration

Construction noise is predicted to reach 96 dBA at 161 New South Head Road. Between 43 and 88 residential receivers would exceed noise management levels, and up to 26 would be highly noise affected (EIRS pp. 108–109).

**Demolition vibration "may exceed cosmetic damage criteria at the nearest commercial receiver"** (EIRS p. 109). Rock excavation will require "heavy ripping equipment, rock hammers, rock saws and/or milling heads" (Geotechnical Investigation, Appendix E1, p. 11).

## Ground 7: Traffic, infrastructure, social and cumulative impacts are not assessed

### The word "cumulative" does not appear in the EIRS's assessment of impacts

The application assesses the site as if nothing else were happening around it.

**The Department's own *Cumulative Impact Assessment Guidelines for State Significant Projects* (March 2026) require each SSD project to be assessed together with "any major greenfield and urban renewal developments that are scheduled for the area"** (**s. 3.4, p. 17). This is an SSD project. Its traffic, flood, groundwater and wind assessments all consider the site in isolation.**

With respect to the Edgecliff-Woollahra Precinct State-led Rezoning Proposal, the Council's submission clearly articulates expectations regarding cumulative impact assessments: **"Any council or private proponent would be required to assess these cumulative impacts as part of a robust evidence base"** (Council submission, p. 101). **Active SSD projects in the precinct already add 738 dwellings** (Council submission, PDF p. 202). **Council estimates capacity for over 6,000 more dwellings through other pathways directly adjacent to the precinct** (Council submission, p. 22).

**The municipality is also under heavy pressure from the uptake of the Low and Mid-Rise Housing Policy and the Affordable Housing Bonus, particularly in Rose Bay and Double Bay. Council estimates that the LMR provisions alone could enable around 4,960 additional dwellings in the Double Bay–Edgecliff area and 2,470 in Rose Bay (Woollahra Municipal Council, Alternate Approach to the State Led Rezoning – Late correspondence memo, 21 August 2026, p. 3).** The cumulative impact of this surrounding development is not considered. The community is rightly worried about how the eastern suburbs' road network and supporting infrastructure will cope with the enthusiastic uptake of the Low and Mid-Rise Housing Policy and the Affordable Housing Bonus, particularly in Rose Bay and Double Bay.

## Traffic congestion is already a problem

The traffic assessment estimates 20 vehicle trips in the morning peak and concludes "there are no road improvements or intersection upgrades required" (EIRS pp. 107–108). Council's own SIDRA traffic modelling of "16 key intersections within the rezoning area" found that "New South Head Road has less than 7% spare capacity" and "multiple intersections currently operate near DoS 1.0" (Council submission, PDF p. 215). A degree of saturation (DoS) of 1.0 means an intersection is at capacity.

Council's traffic consultant recommends dual right-turn lanes and signal changes at Mona Road and New South Head Road, the intersection directly opposite the site (Council submission, PDF p. 223). All vehicle access, including construction traffic and 12.5m service vehicles, would use a shared driveway off Glenmore Road (EIRS p. 33).

## Number of car parking spaces is excessive

**The car parking provision is excessive for a site the EIRS describes as "a 5 minute walk" from Edgecliff Station** (EIRS p. 54). The proposal provides 103 car spaces: 13 commercial, 88 residential and 2 car share (EIRS p. 22). The EIRS does not show how these numbers were derived. It says only that the residential spaces, later given as 86 (14 for the affordable apartments and 72 for the market apartments), are "in accordance with SEPP and Council DCP requirements" (EIRS p. 107). Elsewhere it claims the proposal "provides parking at a reduced rate compared to standard requirements" (EIRS p. 62), without saying which standard. The 14 affordable spaces match the Housing SEPP's minimum rates for affordable dwellings in in-fill affordable housing developments. No calculation is given for the 72 market spaces, about 1.1 spaces for each of the 66 market apartments.

**If the Housing SEPP's minimum rates are driving these figures, this application shows the Government's own parking rules working against its transit-oriented housing objectives.**

Since an amendment on 17 April 2026, consent authorities must consider "Transport for NSW's Guide to Transport Impact Assessment alongside existing car parking controls", which allows them "to assess proposed car parking provisions for infill affordable housing on merit" (NSW Department of Planning, Housing and Infrastructure, In-fill affordable housing webpage).

Every space adds to a basement of up to six levels, excavated about 2–8m below the groundwater table (Appendix E1, p. 12). **Parking is therefore a major driver of the dewatering, settlement and flood risks set out in Ground 4, as well as of extra car trips onto New South Head Road.**

The Department should require the applicant to show how each parking figure was calculated and to justify it against Transport for NSW's guide, with a view to substantially reducing parking on a site this close to the station.

## Contributions and public benefits

The EIRS promises "significant state and local contributions" (EIRS p. xix). They amount to a local levy of about $1.74 million (1% of the development cost) and a state contribution of about $660,000 (EIRS pp. 80, 98). The state contribution applies to only 66 dwellings (EIRS p. 42). That is about $2.4 million on a $174 million project.

**The Council's Edgecliff Commercial Centre Strategy (ECCS) requires developments that benefit from increased capacity "to deliver improved community infrastructure as part of the works"** (quoted in Urban Design Report, Appendix F1, p. 29).

The Urban Design Report suggests "an opportunity for a Voluntary Planning Agreement" (p. 26). But the EIRS confirms "there are no relevant planning agreements or draft planning agreements" (EIRS p. 41).

The footpath awnings the ECCS requires along New South Head Road are not provided (EIRS p. 63). The public through-site link is open only from 7am to 7pm (EIRS pp. 96–98).

**Council's Social Infrastructure Needs Study found many existing facilities, including Woollahra Library at Double Bay, already at or beyond capacity** (Council submission, p. 66).

## Social impact

The Social Impact Assessment by Lote Consulting describes a different building: "a proposed 24-storey mixed use development … one level of commercial use, and five levels of car parking, three of which will be in the basement" (Social Impact Assessment, Appendix U, p. 14). It cites generic SEARs for critical State significant infrastructure from 2015, not the SEARs for this project (p. 34).

**The Social Impact Assessment also fails to carry out the assessment it says is needed. It identifies "increased demand on local infrastructure and services" as a key negative impact (p. 12) and says impacts of this kind require "detailed assessment" (p. 13).** Yet demand on infrastructure is not assessed in its table of impacts (pp. 19–29). It also promises "particular consideration" of vulnerable groups, which it defines as "older persons, people experiencing housing stress, people with mobility limitations and lower-income households" ( p. 12). These are the people most likely to be affected by construction disruption, traffic and loss of amenity.

That consideration is never given. The table simply lists "explicit assessment of vulnerable groups" as something still to be done (Appendix U, p. 29).

**The Social Impact Assessment overshadowing finding was made before the shadow study:** "Consultants have been engaged to undertake a detailed solar access/overshadowing analysis which will be reviewed before the final design is submitted" (p. 26). It then claims the proposal maintains "minimum requirements of solar access to all areas of 'Private Open Space'" (pp. 26–27), even though the EIRS says the ADG requirement for Diseno will not be met (EIRS p. 88).

**The community engagement relied on to "validate" these findings drew 17 survey responses from 4,819 letterboxed households** (EIRS p. 4; Social Impact Assessment, p. 32).

## Conclusion and requests

The application seeks precinct-scale height  ahead of the precinct plan and ahead of the station that plan depends on. It only offers temporary affordable housing in return. Its own reports show severe impacts on neighbours and on the Paddington Heritage Conservation Area, unresolved flood and groundwater risks, and no assessment of cumulative impacts.

I ask the Department and the consent authority to:

1. Refuse the State Significant Development Application and the proposed amendment of the Woollahra LEP 2014.
2. In the alternative, defer determination until the Edgecliff–Woollahra Precinct State-led Rezoning is finalised. Any uplift on this site should be decided within a staged framework, with no stage taking effect until Woollahra Station is committed and delivered.
3. Not accept Council's Alternative Approach as support for this proposal. Council's support for that approach is conditional on staging, a committed station, funded infrastructure and retention of the terraces' principal forms.
4. Require any affordable housing on this site to be delivered on-site, in perpetuity and with amenity equal to the market apartments. Give no weight to in-fill Affordable Housing Bonus reasoning in setting the height or FSR.
5. Before any determination, require:
    - a cumulative impact assessment in accordance with the Department's *Cumulative Impact Assessment Guidelines for State Significant Projects* (March 2026), covering traffic, flooding, groundwater, wind, infrastructure and heritage;
    - a Detailed Flood Impact and Risk Assessment against the revised s9.1 Direction P5.7, using Council's adopted flood mapping and freeboard, current rainfall data, high-emissions climate scenarios and an emergency response plan;
    - groundwater monitoring for at least three months,
    - a structural methodology for protecting the retained terrace facades, and a heritage assessment of options that retain the terraces' principal forms;

- view and solar assessments of Diseno against a scheme that complies with the current controls, including its existing solar access and lower levels;
- wind testing of the lodged design, with testing of the proposed mitigation treatments;
- a corrected Social Impact Assessment of this proposal against this project's SEARs, including infrastructure demand and vulnerable groups.

6. Refer the application to the Independent Planning Commission for determination.

Councillor Merrill Witt Vaucluse Ward, Woollahra Municipal Council

**Sources**


EIRS: Environmental Impact and Rezoning Statement, Ingham Planning, September 2026

Appendix E1: Report on Geotechnical Investigation, Douglas Partners, Revision 1, 7 October 2026

Appendix E2: Dewatering Management Plan, Douglas Partners, Revision 1, 7 October 2026

Appendix F1: Urban Design Report, MHN Design Union, Revision A, 31 August 2026

Appendix O1: Heritage Impact Statement, Urbis, 2026

Appendix R: Flood Impact and Risk Assessment, BG&E, Version 2, September 2026

Appendix U: Social Impact Assessment, Lote Consulting, Revision C, 9 September 2026

Appendix W: Visual and View Impact Assessment, Ingham Planning, September 2026

Appendix X1: Pedestrian Wind Environment Study, Windtech Consultants, Revision 0, 3 August 2026

Council submission: Edgecliff-Woollahra State Led Rezoning – Council Submission, Woollahra Municipal Council, September 2026

Council memo: Alternate Approach to the State Led Rezoning – Late correspondence memo, Woollahra Municipal Council, 21 August 2026

EIE: Explanation of Intended Effect – Edgecliff-Woollahra Precinct State-led Rezoning Proposal, NSW Department of Planning, Housing and Infrastructure, September 2026

Cumulative Impact Assessment Guidelines: Cumulative Impact Assessment Guidelines for State Significant Projects, NSW Department of Planning, Housing and Infrastructure, March 2026

In-fill affordable housing webpage: NSW Department of Planning, Housing and Infrastructure, https://www.planning.nsw.gov.au/the-planning-system/housing/housing-sepp/in-fill-affordable-housing

One Darling Statement of Environmental Effects: Statement of Environmental Effects for the State Significant Development Application at 136–148 New South Head Road, Edgecliff, Ethos Urban